## FHWA Docket No. FHWA-2001-8954 ANPRM- National Bridge Inspection Standards (NBIS) Arkansas Highway and Transportation Department Review Comments

Topic	Comment, Question, Suggestion
Application of Standards	If the minimum bridge length requirement is shortened, more bridge-length structures will be included in the NBI, the number of "deficient" bridges will increase, and more bridges will be
Standards	eligible for HBRRP funding. If more, shorter structures are included in the NBI and HBRRP
	funding levels aren't increased, the progress of reducing the backlog of "deficient" bridges will
Turanastian	decline.
Inspection Procedures	Including the FHWA Technical Advisory T 5140.23 "Evaluating Scour at Bridges" is probably a good idea.
	The theory of scour monitoring during and after each major storm event is conceptually ideal;
	however, the reality of implementing this given the constraints of available, qualified inspection personnel and limited budgets make this a challenging task. Practically, Owners should be
	allowed the flexibility to monitor scour critical structures within realistic limitations.
Frequency of	The maximum interval for inspecting public highway bridges should be 4 years- no more! The
Inspections	decision of which bridge types will be eligible for four-year inspections should reside with the
	State DOT conducting the inspections. The FHWA may set guidelines that govern which bridges should be eligible for four-year inspections.
Qualifications	Bridge inspection, to be performed competently (knowledgeable and precise inspecting,
of Personnel	accuracy and uniformity in reporting) requires specialized training and expertise.
	Consequently, the individual in charge of the inspection and reporting who is a PE should be required to have the same training as bridge inspectors and have additional experience in bridge
	inspection. Only Civil Engineers and Structural Engineers with a background in bridge
	engineering should be in charge of the overall inspection program; however, it is recommended
	to retain the provision that allows bridge inspection team leaders to be qualified based on years
	experience and certification training.
	The suggestion has merit requiring certification training in proportion to the complexity of the
	bridge structure being inspected, and making this a part of the requirement for inspectors under
	the NBIS. Levels of bridge inspection certification expertise in various bridge construction methods and types will promote that trained, experienced, competent personnel are assigned to
	inspect the most complex, demanding bridges.
	Qualified licensed Professional Engineers with a background in bridge engineering should be in charge of underwater bridge inspections. If the PE does not personally perform the underwater
	inspection, appropriate audio and video communication with the certified dive inspector should
	be used by the PE to oversee and coordinate the inspection process.
Inspection	Bridge Inspection Reports are legal documents and are used in Court proceedings. Therefore,
Report	changes to a report by anyone other than by the person who signed and submitted the report (i.e., team leader conducting the bridge inspection) should be allowed only if that person is
	consulted and concurs, and supporting documentation is included in the inspection report.